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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CALIFORNIA COALITION FOR WOMEN  
 PRISONERS; R.B.; A.H.R.; S.L.; J.L.; J.M.;  
 G.M.; A.S.; and L.T., individuals on behalf of  
 themselves and all others similarly situated,

Plaintiffs,

v.

UNITED STATES OF AMERICA FEDERAL  
 BUREAU OF PRISONS, a governmental entity;  
 BUREAU OF PRISONS DIRECTOR COLETTE  
 PETERS, in her official capacity; FCI DUBLIN  
 WARDEN THAHESHA JUSINO, in her official  
 capacity; OFFICER BELLHOUSE, in his  
 individual capacity; OFFICER GACAD, in his  
 individual capacity; OFFICER JONES, in his  
 individual capacity; LIEUTENANT JONES, in  
 her individual capacity; OFFICER LEWIS, in his  
 individual capacity; OFFICER NUNLEY, in his  
 individual capacity; OFFICER POOL, in his  
 individual capacity; LIEUTENANT PUTNAM, in  
 his individual capacity; OFFICER SERRANO, in  
 his individual capacity; OFFICER SHIRLEY, in  
 his individual capacity; OFFICER SMITH, in his  
 individual capacity; and OFFICER VASQUEZ, in  
 her individual capacity,

Defendants.

Case No. 4:23-cv-04155

**DECLARATION OF C [REDACTED]  
 B [REDACTED] IN SUPPORT OF  
 PLAINTIFFS' MOTIONS FOR  
 PRELIMINARY INJUNCTION  
 AND PROVISIONAL CLASS  
 CERTIFICATION**

[4317391.4]

DECLARATION OF C [REDACTED] B [REDACTED] IN SUPPORT OF PLAINTIFFS' MOTIONS FOR PRELIMINARY  
 INJUNCTION AND PROVISIONAL CLASS CERTIFICATION

1 I, C [REDACTED] B [REDACTED], declare:

2 1. I have personal knowledge of the facts set forth herein, and if called as a  
3 witness, I could and would competently so testify. I make this declaration in support of  
4 Plaintiffs' Motions for Preliminary Injunction and Provisional Class Certification.

5 2. I am incarcerated in federal prison and have been incarcerated at FCI Dublin  
6 from February 2020 to present. In the future BOP may transfer me to other BOP facilities  
7 but at any point I could be transferred back to FCI Dublin.

8 3. FCI Dublin's inadequate systems for preventing, detecting, and responding  
9 to sexual abuse have caused actual harm to myself and others incarcerated at FCI Dublin  
10 and put myself and other incarcerated persons at substantial risk of serious harm from  
11 sexual assault, harassment, and retaliation from staff.

12 4. While at FCI Dublin, Officers Poole and Jones expected us to do sexual  
13 favors for them and retaliated against us if we said anything. I knew these officers  
14 mistreated women in the prison because they often called women "bitches" and treated us  
15 badly by taking away our property, throwing away our property without reason, and  
16 making us do extra work than what was required. I tried to stay away from them, but I  
17 could not avoid them as much as I tried.

18 5. Around Thanksgiving 2021, I was working in food service. I saw Officers  
19 Poole and Jones in the same area speaking to another incarcerated woman. She told me  
20 that the officers told her, "If I'm working here, I'll be expecting sexual favors." I walked  
21 back towards the office, and Officer Poole saw me and ran after me and yelled, "I'll fuck  
22 up your world." I understood that to be a threat because Officer Poole thought I was going  
23 to report him for what he said to the other incarcerated woman. He then went straight into  
24 my room where my property was locked. He asked the unit officer to open my property  
25 and took everything I owned to the trash for Food Service, where they smash everything to  
26 dispose of it. This was hundreds of dollars of my possessions, and I was left with no  
27 clothes or underwear, aside from the ones that I was wearing that day and my uniform.  
28 Officer Poole did this in front of all the officers in the unit and I felt humiliated.

1           6.       I was expected to go to work the next day, even though I had no clothes  
2 aside from the ones I had been wearing the day before. When I resisted going to work the  
3 next day without clean clothes or underwear, Officer Jones issued me a shot. After that, I  
4 wrote to Ms. Minor, the unit manager at the time, about not being able to go to work  
5 without clothes, and she took me to Lieutenant Putnam's office. I made my report about  
6 everything that happened with Officer Poole. In reference to my cell search, he said he  
7 didn't know what I was talking about and then switched to saying he would look at it, but  
8 to my knowledge he never did anything about it. Later, I was issued disposable underwear  
9 for three days, until one pair of new underwear was issued to me.

10           7.       I never returned to work at Food Service until Officers Poole and Jones were  
11 walked off a few weeks later because I wanted to avoid these officers and their ongoing  
12 harassment of me. Even after not returning to work, Officer Poole often laughed and  
13 taunted me about having thrown away my things while I walked to the medical line. I  
14 know he did this to target me because I saw him at the medical line even on days when I  
15 knew he was not normally supposed to be there.

16           8.       When I arrived at FCI Dublin in February 2020 I was not provided adequate  
17 training and information about how to respond to sexual abuse. I was never given any  
18 training about what PREA entailed and I only knew about PREA from the information  
19 other incarcerated people gave me.

20           9.       There is no effective way to confidentially report sexual assault and abuse by  
21 staff at FCI Dublin. When incarcerated persons report sexual abuse by staff, FCI Dublin  
22 and BOP do not seriously investigate the reports. Investigations are frequently delayed  
23 and overseen by staff who know and work with the offending staff member. Generally  
24 nothing happens as a result. Even when people report to SIS Lieutenant Putnam, there is  
25 no investigation done for these reports. When I reported to Lieutenant Putnam around  
26 Thanksgiving 2021, I was never called back to the office to discuss my report, and no one  
27 ever contacted me about PREA until early 2023, almost a year and a half after the incident  
28 I reported.

1           10. I filed a tort claim about the loss of my property about three weeks after the  
2 incident with Officer Poole and included receipts. That was almost two years ago. I  
3 finally received a response on June 20, 2023, offering only a small fraction of what I had  
4 claimed, just \$50 when my items were worth over \$500.

5           11. Staff at FCI Dublin prevent people from reporting sexual assault and abuse  
6 by staff and retaliate against people who do report. Officer Poole's comments made it  
7 clear that his cell search was in retaliation for believing I was going to report. When I did  
8 report to Lieutenant Putnam, I felt scared, and after I did, I did not want to go back to work  
9 in Food Service, where Officer Poole was still working. I also stopped going to mainline  
10 because I didn't want to see him, and I would avoid eating sometimes to avoid seeing him  
11 in mainline. I also knew that if I reported in the future, he could do the same or worse by  
12 sending me to the Special Housing Unit or doing something even worse.

13           12. There is little to no medical care available to survivors of sexual abuse and  
14 assault at FCI Dublin, and there is no confidential mental health care available to  
15 survivors. I was previously on a series of medications including Gabapentin, Abilify, and  
16 Prozac. In approximately December 2022, they took me off all my psychiatric and pain  
17 medication without warning even though I have bipolar disorder, depression, and nerve  
18 damage that requires pain medications. I asked to speak with my counselor, but I was not  
19 able to see them for months. They have told me that I need to see a psychiatric doctor but  
20 there is no such doctor in the facility. In approximately mid-June 2023, I was finally put  
21 back on Prozac, but I still have not received my antipsychotic or pain medications. Due to  
22 the long gap without my psychiatric and pain medications, I had felt my depression  
23 worsening, and I have been tired more often. I was never informed about Tri-Valley Care  
24 as a way for survivors to speak with an outside counselor.

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1 I declare under penalty of perjury under the laws of the United States of America  
2 that the foregoing is true and correct to the best of my knowledge, and that this declaration  
3 is executed at Dublin, California this 15th day of August, 2023.

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